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February 24, 2021

The Honorable Ronnie Abrams
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Travel Request - *United States v. Yarisons Concepcion*, 19 Cr. 476 (RA)

Dear Judge Abrams,

I represent Yarisons Concepcion in the above-mentioned case. Mr. Concepcion is currently released on bail and is participating in the SDNY Young Adult Opportunity Program. He is scheduled to graduate the program on March 2nd and has been in full compliance.

I respectfully ask the Court to modify Mr. Concepcion's bail conditions so that he may travel to the Dominican Republic from March 30th to April 9th to visit his elderly grandparents. His grandfather, unfortunately, is unwell. If our application is granted, Mr. Concepcion will be staying with his grandparents while in Dominican Republic and will share his complete itinerary with Pretrial. He will also need Pretrial to temporarily release his passport in order to travel.

I am informed by AUSA Peter Davis that the government objects to the proposed request. Pretrial Officer Rena Bolin has informed me that Pretrial does not take a position on international travel but does note that Mr. Concepcion, as mentioned above, is scheduled to graduate the program on March 2nd and has been in full compliance with all conditions.

Thank you in advance for your consideration.

Sincerely,



Christopher Madiou
Counsel for Yarisons Concepcion

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
February 24, 2021

Cc: AUSA Peter Davis (via ECF)
U.S. Pretrial Services Officer Rena Bolin (via email)